

RENEGADE ACUPUNCTURIST MEDIA, LLC v. KIMBERLY THOMPSON
CASE No. 4:22-cv-03049-JD

EXHIBIT A
TO PLAINTIFF'S RESPONSE IN OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS

TO BE FILED UNDER SEAL
(MOTION TO SEAL PENDING)

REDACTED
WEBER AFFIDAVIT

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

**RENEGADE ACUPUNCTURIST
MEDIA, LLC,**

Plaintiff,

V.

KIMBERLY THOMPSON,

Defendant.

Case No. 4:22-cv-03049-JD

AFFIDAVIT OF TONYA WEBER

I, Tonya Weber, after first being duly sworn, do hereby make oath and affirm as follows:

1. I am a member of Renegade Acupuncturist Media, LLC ("Renegade").

2. I have personal knowledge regarding the information referenced herein.

3. [REDACTED]

4. [REDACTED]

5. [REDACTED]

6. [REDACTED]

7. Prior to Defendant's participation in Renegade's Advanced Mentoring Program, Defendant submitted a baseline questionnaire, which is attached as Exhibit 1. In this questionnaire, Defendant noted that she:

a.

b.

c.

d.

e.

f.

g.

8. Through #SHIFT and AMP, Defendant was provided tools that would permit her to remedy these specific issues, including (but not limited to):

a.

b.

c.

d.

e.

f.

g.

9. On September 1, 2022, we successfully registered a Renegade representative for the AcuGraph Accelerator Program.

10. On September 7, 2022, this registration was cancelled and refunded by Defendant, AcuGraph, or her or their representatives.

11. On September 7, 2022, Renegade representatives were able to successfully register another representative for the AcuGraph Accelerator Program.

12. One of my clinic's staff members attended the AcuGraph Accelerator Program through this registration on September 12, 2022.

13. She reported to me during her attendance at the AcuGraph Accelerator Program on September 12, 2022, that the Defendant's program "is a mirror of us."

14. On September 16, 2022, this registration was cancelled by Defendant, AcuGraph, or her or their representatives.

15. Renegade hoped to gather additional evidentiary support regarding how the Defendant's online program through AcuGraph and the on-site visit to Defendant's clinic violates her confidentiality and non-use obligations.

16. [REDACTED]

17. [REDACTED]

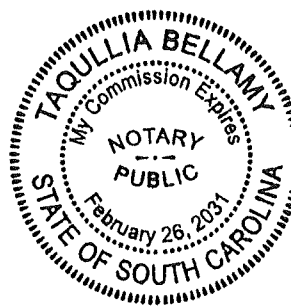
Tonya Webb

SWORN to and subscribed before me
this 10 day of Oct, 2022.

Taoullia Bellamy

Notary Public State of South Carolina

My Commission Expires: 2/26/31



RENEGADE ACUPUNCTURIST MEDIA, LLC v. KIMBERLY THOMPSON
CASE No. 4:22-cv-03049-JD

EXHIBIT 1
TO AFFIDAVIT OF TONYA WEBER

TO BE FILED UNDER SEAL
(MOTION TO SEAL PENDING)

REDACTED
BASELINE ONBOARDING QUESTIONNAIRE

Advanced Mentoring Program - Practice Analysis - Baseline Questionnaire

Please take your time and answer ALL questions THOUGHTFULLY and ACCURATELY.

If we ask for numbers, please take the time to calculate vs taking a guess.

We need this info to get an accurate picture of where you are, what your weaknesses and strengths are, how best to tailor the program to best meet your needs and measure progress.

Contact Information

Name *

[REDACTED]

Cell Number *

[REDACTED]

Mailing Address *

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

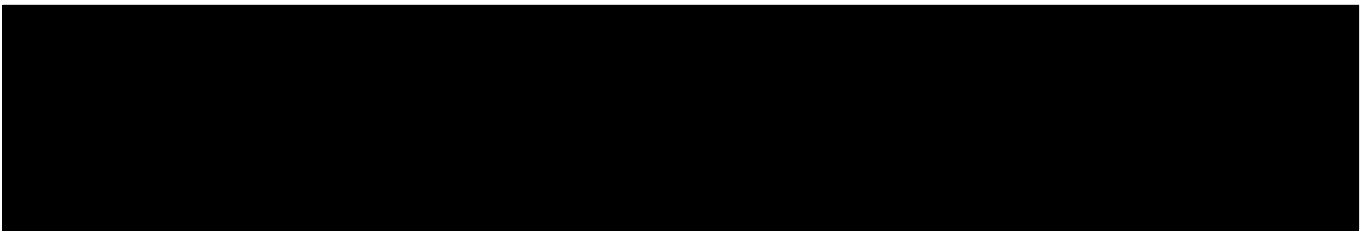
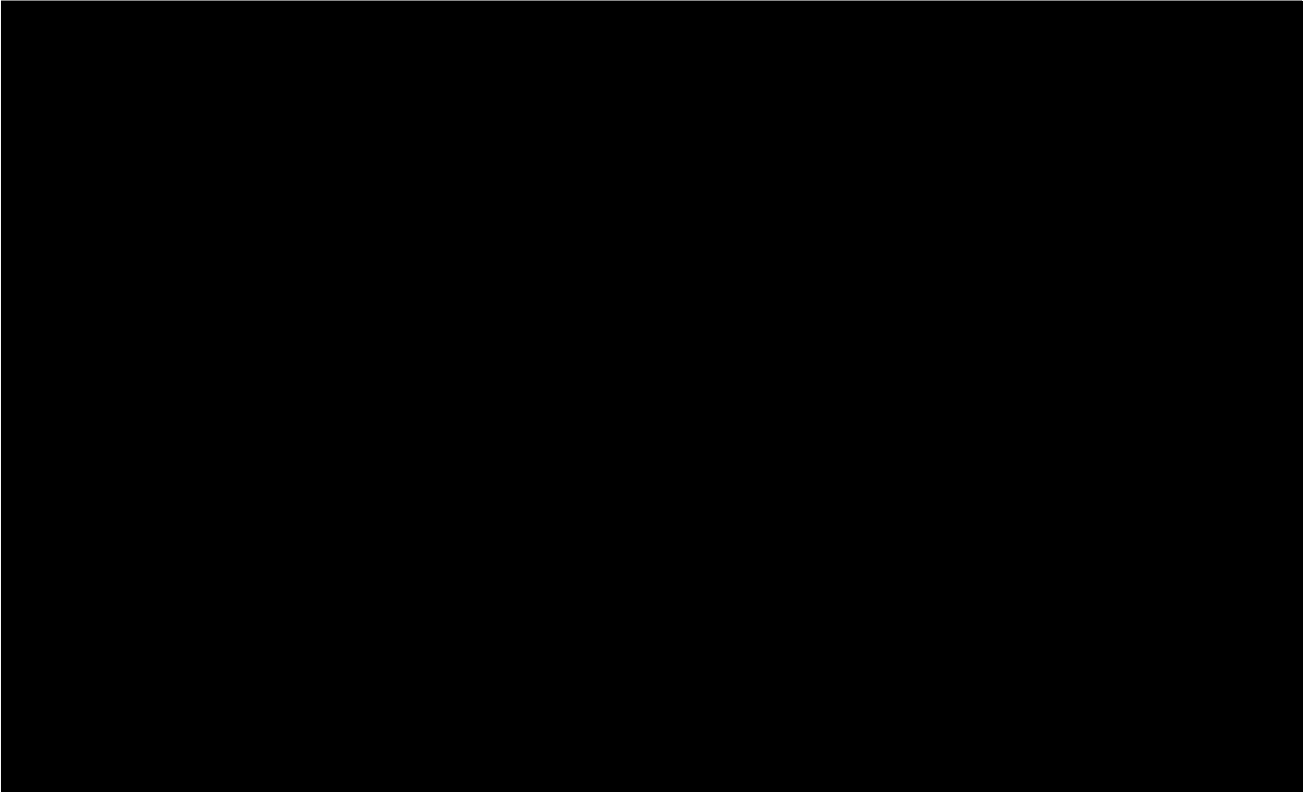
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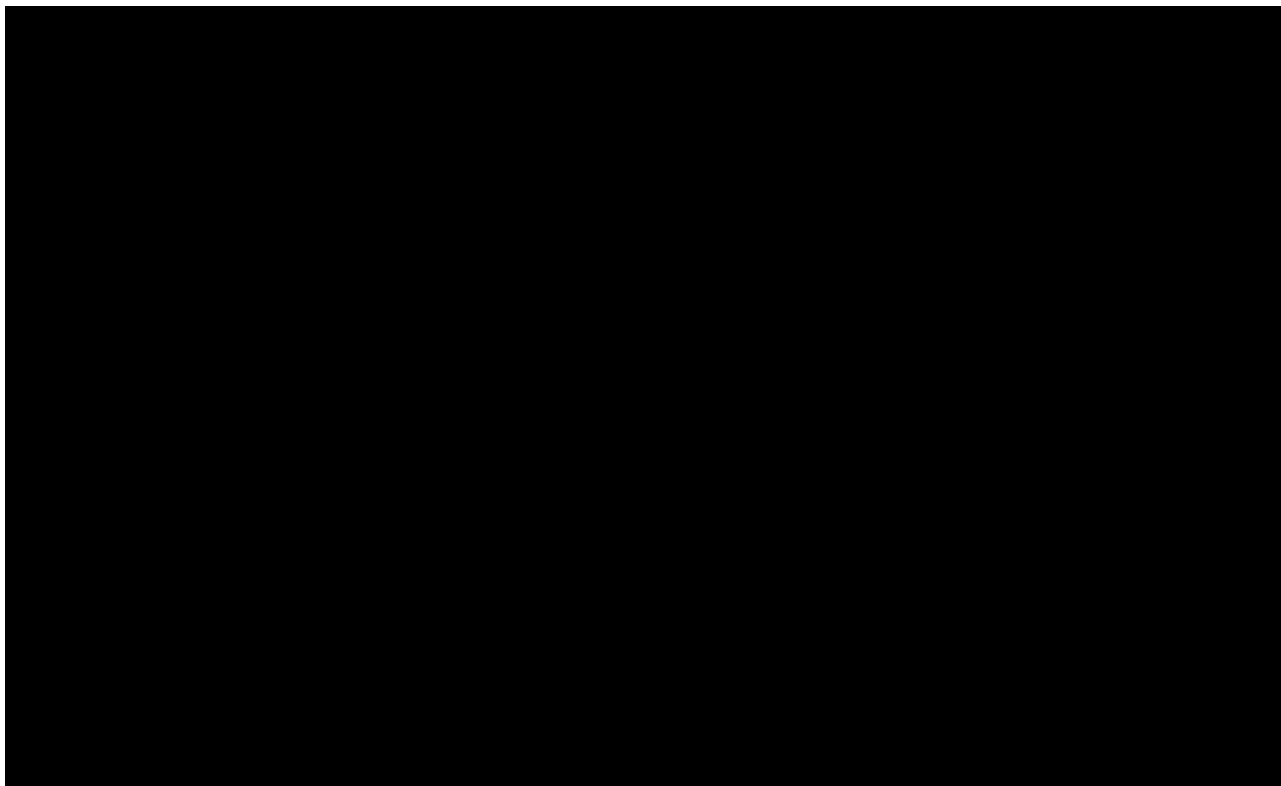
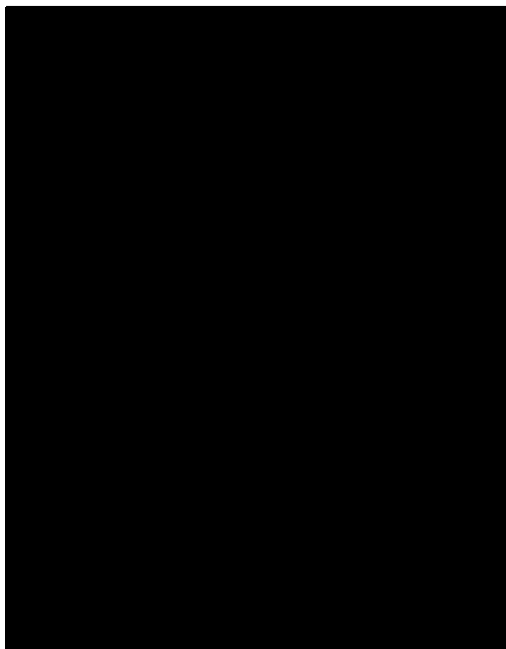
[REDACTED]

[REDACTED]

[REDACTED]

*





[REDACTED]

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ADVERTISING/ NEW PATIENTS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

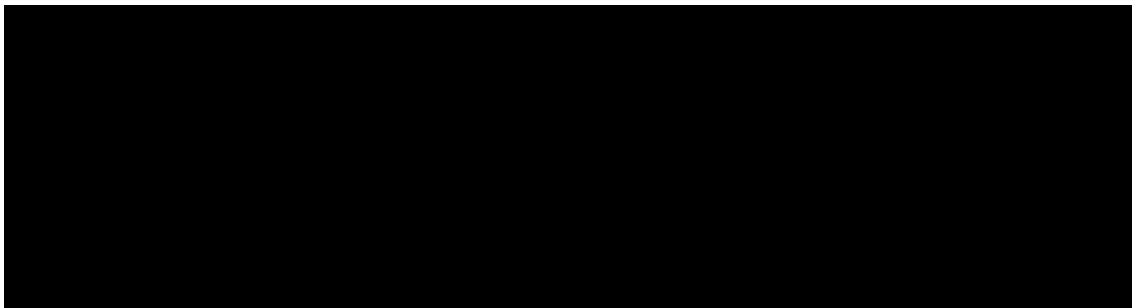
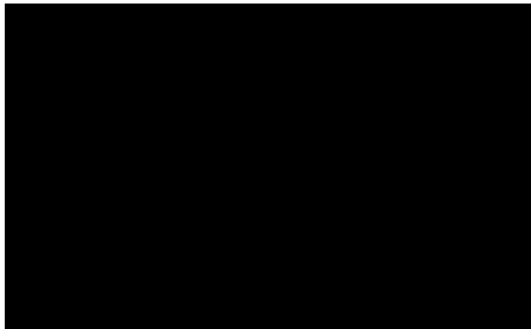
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

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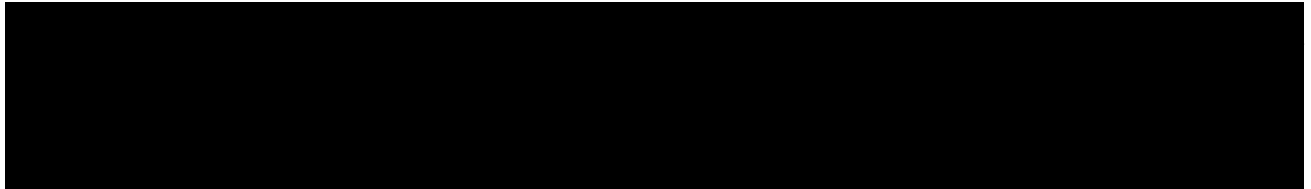
[REDACTED]

[REDACTED]

★

[REDACTED]

[REDACTED]



This form was created inside of Renegade Acupuncturist.

Google Forms